

**ANDERSON, ECKSTEIN AND WESTRICK, INC.**

51301 Schoenherr Road, Shelby Township, Michigan 48315  
Civil Engineers • Surveyors • Architects 586-726-1234

FILED/ACCEPTED

JAN 17 2012

Federal Communications Commission  
Office of the Secretary

January 13, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

Re: LightSquared Subsidiary, LLC  
Ex Parte Communication. IB Docket No. 11-109  
IBSF File No. SAT-MOD-20101118-00239

Secretary Dortch,

It has come to my attention that Lightsquared LLC is seeking FCC affirmation of its license so that it may begin the work necessary to implement its 4G-LTE terrestrial system. This system has repeatedly been proven by Lightsquared LLC to be detrimental to the use of certain GPS devices. The use of these GPS devices is extremely important for everyday activities across the United States. Allowing Lightsquared LLC to continue towards the implementation of this system will be detrimental to the best interests of the citizens of our nation. I implore you to deny this request from Lightsquared LLC.

I am a professional surveyor, licensed in Michigan. As a surveyor, accuracy is the key component of my work. Much of what I do requires the determination of high accuracy positions. The necessity for accuracy is not new, nor is it GPS dependant. The level of accuracy that I must achieve can be obtained using the instruments and methodologies that pre-existed GPS. I still have those instruments at my office. However, I don't use those instruments nearly as much as I used to. I can now obtain the necessary accurate positioning by using my high accuracy GPS devices, and I can acquire those positions in a fraction of the time. So if Lightsquared is allowed to implement this system, the advances in my profession that I have integrated into my office practices and products will be lost.

The real affect of the loss of high accuracy GPS services will be felt by the community in which I practice. Over that past 20 years, the advantages afforded to me through the accessibility of high accuracy GPS have greatly benefited my clients. Every project that allows me to use my high accuracy GPS is a project that will save money for my client. From the small scale flood plain surveys where I can use GPS to efficiently determine

No. of Copies rec'd  
L: ABCDE

0




Page 2

whether or not a parcel is prone to flooding, to a city-wide infrastructure analysis project where GPS is used to accurately locate thousands of structures, a significant cost savings is realized by the homeowner or an entire community.

The accessibility of high accuracy GPS has also allowed the development of projects that would not have been affordable otherwise. I was involved with a project for a metropolitan Detroit city that was trying to sort out its sewer systems. The city's records defining the complexity of the inter-working of more than 14,000 structures were insufficient. What the city did know is that heavy rains would cause sanitary sewers to back up into homes, and overflow into rivers and lakes. The primary step of rectifying this reoccurring environmental disaster was developing an accurate comprehensive map of the entire system. The only way to create such a map, with the available funding, was GPS. By using GPS, we were able to provide the mapping of that allowed the analysis of the system that will improve the environment and the living condition of the residents of that community. Without the accessibility of high accuracy GPS, the job would have been cost prohibitive.

High accuracy GPS is vital to me as a surveyor. More importantly, high accuracy GPS benefits every one of my clients in southeast Michigan. I implore you to deny Lightsquared's request to affirm their license, allowing them to work on the implementation of a system that will have a far-reaching adverse affect, as proven by Lightsquared, on my clients and the clients of surveyors across the United States.

Sincerely,

  
Craig R. Arney PS

**From:** myIBFS  
**Sent:** Friday, January 13, 2012 11:11 AM  
**To:** Gerald Mays; Sarita Kale; Siva Appavu; Andrea Kelly; Stephen Duall; Kathryn Medley; CurTrisha Banks; Kathleen Campbell  
**Subject:** Pleadings and Comments Notification from MyIBFS

Type of Pleading: LETTER

Date filed: 01/13/2012

Filer Information:  
Craig P. Amey, PS  
Anderson, Eckstein and Westrick, Inc

Contact Information:

Proceedings List

File Number	Callsign	Applicant
SATMOD2010111800239	S2358	LightSquared Subsidiary LLC